

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

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Rodney Parker #315646  
[Enter the full name of the plaintiff in this action]

Civil Action No. \_\_\_\_\_  
(to be assigned by Clerk)

v.

**COMPLAINT**  
**State Prisoner**

Warden Stevenson, et al

Enter above the full name of defendant(s) in this action

**I. PREVIOUS LAWSUITS**

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise related to your imprisonment? Yes \_\_\_\_\_ No ☒
- B. If your answer to A is Yes, describe the lawsuit in the space below. If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.
1. Parties to this previous lawsuit:  
Plaintiff: \_\_\_\_\_  
Defendant(s): \_\_\_\_\_
  2. Court: \_\_\_\_\_  
(If federal court, name the district; if state court, name the county)
  3. Docket Number: \_\_\_\_\_
  4. Name(s) of Judge(s) to whom case was assigned: \_\_\_\_\_
  5. Disposition: \_\_\_\_\_  
(For example, was the case dismissed? Appealed? Pending?)
  6. Approximate date of filing lawsuit: \_\_\_\_\_
  7. Approximate date of disposition: \_\_\_\_\_



## II. PLACE OF PRESENT CONFINEMENT

- A. Name of Prison/Jail/Institution: Lieber Correctional Institution
- B. What are the issues that you are attempting to litigate in the above-captioned case? Negligence, excessive Force and cruel and unusual punishment
- C. (1) Is there a prisoner grievance procedure in this institution? Yes ☒ No ☐
- (2) Did you file a grievance concerning the claims you are raising in this matter? Yes ☒ No ☐
- When \_\_\_\_\_ Grievance Number (if available) \_\_\_\_\_
- D. Have you received a final agency/departamental/institutional answer or determination concerning this matter (i.e., your grievance)? Yes ☒ No ☐
- E. When was the final agency/departamental/institutional answer or determination received by you? \_\_\_\_\_
- If possible, please attach a copy of your grievance and a copy of the highest level decision concerning your grievance that you have received.*
- F. If there is no prison grievance procedures in this institution, did you complain to prison, jail, or institutional authorities? Yes ☒ No ☐
- G. If your answer is YES:
1. What steps did you take? I filed a complaint
  2. What was the result? No relief for the action I requested

## III. PARTIES

*In Item A below, place your name, inmate number, and address in the space provided. Do the same for additional plaintiffs, if any.*

- A. Name of Plaintiff: Rodney Parker Inmate No.: 315646
- Address: P.O. Box 265 Ridgerville, SC 29412

*In Item B below, place the full name of the defendant, his official position, and place of employment in the space provided. Use Item C for additional defendants, if any.*

- B. Name of Defendant: Stevenson Position: Warden
- Place of Employment: BRCI

- C. Additional Defendants (provide the same information for each defendant as listed in Item B above):

May Sullivan, Cpt. Washington, Lt. Jackson, Sgt. Esterline, Sgt. J.C. Williams, OFC. Becker, OFC. McCoy, OFC. Suarez, OFC. Dooley  
Nurse K. McCullough, Nurse Jane Doe,



## IV. STATEMENT OF CLAIM

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach an extra sheet if necessary.

On March 25, 2011, I got into a dispute with Sgt. Esterline about my legal material that I've been trying to get ever since I came to BREC. Sgt. Esterline stated that he didn't care if I get my legal material. At that time, I threw feces on Sgt. Esterline. A Force cell movement team was put together, at which time I was extracted from my cell #115. In the process the video footage ran out. For the duration of the time video footage was out, I was severely beaten by the officers. I was kicked, punched, had knees and elbows dropped on me and I was choked unconscious, which resulted in me being badly bruised and banged up. The restraints were placed on my wrist and ankles extremely tight cutting into my skin deeply leaving permanent scars on both my wrist and ankles. Also the belly chains were pulled extremely tight cutting into my skin leaving permanent scars on my abdomen. I was snatched off the floor by the shackles and cuffs and carried into the SMH Sally port where I was again roughly handled. I was then strapped down to a mechanical restraint chair contraption, for 4 hrs. Again, I was extremely strapped down in this contraption adding further damage to my body. I was minimally examined by nurses who went along with these officers' unprofessionalism. After 4 hrs of being in the restraint chair I was escorted ~~by~~ back to my cell #115, and was completely stripped naked in front of all the officers, adding to my humiliation. Everything was removed from my cell leaving



## IV. STATEMENT OF CLAIM - continued.

Me with only the cold hard steel to sleep on, and cold concrete to walk on. I was left like this for approximately 4 months, which resulted in me suffering mental, physical and emotional trauma. My legs, feet and ankles swole up tremendously as a result of these cruel and unusual conditions I endured. I also had to undergo psychiatric treatment for the trauma I experienced at BRCI. I was sent to Gilliam Psychiatric Hospital for further treatment. Im currently still taking psychotropic medication as a result of the cruel and unusual punishment I endured at BRCI.



## V. RELIEF

State briefly and exactly what you want the court to do for you.

Wherefore, I would like to receive the following relief from the courts:

1. \$ 100,000 in compensatory damages for the use of excessive force and strip cell
2. \$ 5,000 against each defendant in their individual capacity for excessive force
3. \$ 5,000 against each defendant in their official capacity for excessive force
4. \$ 100,000 in punitive damages for the use of excessive force and strip cell
5. Any and all relief that the courts seem just and fair.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this September day of 22, 20 13.

R. Parker

Signature of Plaintiff